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14300 Cody Circle
Anchorage, Alaska 99516
August 20, 2003

Susan Childs
Bureau of Land Management
Alaska State Office
222 West 7th Avenue
Anchorage, Alaska 99513-7599

Dear Ms Childs:

1

I would like to submit my comments on the Integrated Activity Plan/Environmental Impact Statement regarding leases in the northeast National Petroleum Reserve – Alaska. I want to focus on my concerns regarding Teshekpuk Lake and the wetland complex around the lake (Teshekpuk Lake Surface Protection Area) that are presently in a no-lease zone under the Bureau of Land Management's (BLM) 1998 Northeast National Petroleum Reserve – Alaska IAP/EIS.

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As a migratory bird biologist, I worked for the U. S. Fish and Wildlife Service doing field work in the northeastern portion of the NPR-A in 1980, 1982 and 1984. I know firsthand of the exceptional wildlife values of this area as well as its importance to subsistence hunters from several communities on the North Slope.

003
General

I was part of an inter-agency team that drafted the first plan which led to leasing closures by Interior Secretary James Watt in 1983. That plan involved a lot of give and take as members struggled with the need to meet energy mandates and the need to protect valuable wildlife habitats. Ironically, that plan contained far more protection for habitat in the area around Teshekpuk Lake at a time when black brant numbers had not started an alarming decline, spectacled eiders were not yet listed as threatened under the Endangered Species Act, and yellow-billed loons, king eider, long-tailed ducks, buff-breasted sandpipers, and dunlin numbers were not creating red flags to managers. The energy needs of the U.S. at that time were perceived as critical and were known as the "energy crisis" but still BLM and the Interior Department saw fit to protect one of the most important wetland complexes in the Arctic in the northeast NPR-A.

004
Birds

The area northeast of Teshekpuk Lake has long been recognized for its importance to molting geese. The area attracts up to 37,000 brant, 35,000 greater white-fronted geese, and thousands of Canada and snow geese in July and August for their annual molt. Molting brant make up to 30 percent of the entire Pacific population. For the importance of this habitat to molting geese, I urge you to continue leasing closures in this area. Loss

of habitat at this critical point in the life cycle of geese could have far reaching effects on populations from many parts of the world.

005
Threatened

The Teshekpuk Lake area is also important to many other bird species, including spectacled eiders, a threatened species under the Endangered Species Act. No matter what mitigated measures are put in place, oil and gas development will affect nesting habitat and species will suffer from both disturbance and the increased numbers of predators that follow oilfield development. In addition, the 45,000 Teshekpuk Lake Caribou Herd uses this area to seek relief from insects and is an important subsistence source to North Slope hunters. BLM should consider the effects of jeopardizing this habitat for caribou by opening it to leasing.

6

As in the initial planning stages of NPR_A back in the early 1980's, I recognize the need for domestic supplies of energy and I am not against oil and gas leasing in the Reserve. However, I do not support BLM's preferred alternative, which would allow oil and gas development in all but 213,000 acres of what is now the 857,859-acre Teshekpuk Lake Surface Protection Area.

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As an argument for amending the 1998 Northeast IAP/EIS, the BLM states that it is fulfilling a mandate by the President's energy policy that directs the Secretary of the Interior to "consider additional environmentally responsible oil and gas development, based on sound science and the best available technology, through further lease sales in the National Petroleum Reserve – Alaska." I do not believe the BLM has made a case for considering additional development either based on sound science or best available technology. I find no compelling argument that justifies leasing more acres than was determined by planning teams (with the public process) in 1983 and/or 1998. If anything, the habitat has become even more precious to dwindling and threatened populations of birds.

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I urge the BLM to reject its preferred alternative, which would allow oil and gas development in all but 213,000 acres of the Teshekpuk Lake Surface Protection Area. I support Alternative A – No Action- which maintains the existing balance between oil and gas development and protection, a balance which was worked out through a long grueling public process in the 1998 Plan. I find no support for amending that Plan in the information presented in the Draft Amended IAP/EIS.

Thank you for extending the deadline to comment and for consideration of these comments.

Sincerely,

Mary E. Hogan
Retired Wildlife Biologist, USFWS